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May 3, 2021

**VIA CM/ECF**

The Honorable Michael J. Davis  
United States District Court Judge  
District of Minnesota  
United States District Court  
300 South Fourth Street  
Minneapolis, MN 55415

**Re:** *Handwerk, et al. v. Bayer CropScience LP, et al.*, No. 21-cv-00351  
*Flaten, et al. v. Bayer CropScience LP, et al.*, No. 21-cv-00404  
*Pfaff, et al. v. Bayer CropScience LP, et al.*, No. 21-cv-00462  
*Eagle Lake Farms P'ship, et al. v. Bayer CropScience LP, et al.*, No. 21-cv-00543  
*Wunsch Farms, et al. v. Bayer CropScience LP et al.*, No. 21-cv-00970

Dear Judge Davis:

Plaintiffs in the related cases (“Plaintiffs”) write to respond to the Bayer Defendants’ (Bayer CropScience LP and Bayer CropScience, Inc.) April 28, 2021, letter to the Court regarding the Bayer Defendants’ Motions to Transfer Venue Under 28 U.S.C. § 1404.<sup>1</sup>

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<sup>1</sup> The related cases are *Handwerk et al. v. Bayer CropScience LP et al.*, Case No. 21-cv-00351; *Flaten et al. v. Bayer CropScience LP et al.*, Case No. 21-cv-00404; *Pfaff et al. v. Bayer CropScience LP et al.*, Case No. 21-cv-00462; *Carlson et al. v. Bayer CropScience LP et al.*, Case No. 21-cv-00475; *Ryan Bros., Inc. et al. v. Bayer CropScience LP et al.*, Case No. 21-cv-00433; *Eagle Lake Farms P'ship et al. v. Bayer CropScience LP et al.*, Case No. 21-cv-00543; *Schultz et al. v. Bayer CropScience LP et al.*, Case No. 21-cv-00681; *Hapka Farms, Inc. et al. v. Bayer CropScience LP et al.*, Case No. 21-cv-00685; *Dekrey et al. v. Bayer CropScience LP et al.*, Case No. 21-cv-00639; *Beeman Berry Farm, LLC et al. v. Bayer CropScience LP et al.*, Case No. 21-cv-00719; *Wunsch Farms et al. v.*

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Plaintiffs agree that the motions to transfer filed in the individual related cases are moot. Plaintiffs have met and conferred with counsel for the Bayer Defendants and the parties agree that an omnibus motion and opposition directed to the Consolidated Amended Complaint would be most efficient for the parties and the Court. The parties will prepare a stipulation and order on the briefing schedule as directed by the Court's Order of April 30, 2021. Accordingly, Plaintiffs will not file individual opposition(s) to the Bayer Defendants' motions in the related cases on May 5, 2021, but will file an omnibus opposition in the timeframe ordered by the Court.

Thank you for the Court's consideration.

Respectfully submitted,  
GUSTAFSON GLUEK PLLC



Michelle J. Looby

*Counsel for Plaintiffs Randi Handwerk, Dan Flaten, Leon Pfaff, Eagle Lake Farms Partnership, and Wunsch Farms*

MJL/jlh

cc: All Counsel of Record (via ECF)